

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SHAUN ROBERTS and KEN SHEPPARD,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiffs,

v.

STEPHEN EHRLICH, GERARD HANSHE,  
DAVID BROSGOL, JANICE BARRILLEAUX,  
PHILIP EYTAN, JARRETT LILIEN, RYAN  
WHOLEY, LEWIS BATEMAN, DAVID  
BRILL, JON BROSDAHAN, DAN  
COSTANTINO, MARSHALL JENSEN, and  
EVAN PSAROPOULOS, and BRIAN BROOKS,

Defendants.

Case No. 1:22-cv-09590-PKC

Assigned Judge: Hon. P. Kevin Castel

**NOTICE OF PLAINTIFFS’  
UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL  
OF PROPOSED CLASS ACTION  
SETTLEMENT**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that Lead Plaintiffs Johnny Johnson, Eirian Johnson, and Ezra Boekweg (“Lead Plaintiffs”), along with additional named plaintiffs Shaun Roberts, Ken Sheppard, and Randy Roberts (together with Lead Plaintiffs, “Plaintiffs”), on behalf of themselves and each Class Member (as defined below), through Court-appointed Lead Counsel, Scott+Scott Attorneys at Law LLP and Taylor-Copeland Law, hereby move this Court for an Order, pursuant to Federal Rule of Civil Procedure 23, for the entry of an Order: (i) preliminarily approving the proposed Settlement of this securities class action; (ii) approving the form and manner of providing notice of the proposed Settlement to the Settlement Class, including the procedures and deadlines for objecting, and seeking exclusion from the Settlement Class; (iii) scheduling a date for the Settlement Fairness Hearing; (iv) appointing Paul R. Hage, acting in his capacity as Plan Administrator for the Voyager Wind-Down Debtor as the Claims Administrator to administer the

Settlement; and (v) granting such other and further relief as the Court may deem fair and proper. Settling Defendants do not oppose the relief requested in this motion.

This motion is based on the accompanying Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Proposed Class Action Settlement and the Declaration of Sean T. Masson in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Proposed Class Action Settlement, dated April 4, 2024, all exhibits attached herewith, and all pleadings records and papers on file herein.

DATED: April 4, 2024

**SCOTT+SCOTT ATTORNEYS AT LAW LLP**

*s/ Sean T. Masson*  
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*Lead Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by CM/ECF on April 4, 2024, on all counsel or parties of record. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

*s/ Sean T. Masson*  
Sean T. Masson